

**Department for Communities Housing Supply Strategy 2022-2037**

**Consultation Response from Propertymark**

**Background**

Propertymark is the UK's leading professional body for estate and letting agents, inventory providers, commercial agents, auctioneers and valuers, comprising nearly 18,000 members. We are member-led with a Board which is made up of practicing agents and we work closely with our members to set professional standards through regulation, accredited and recognised qualifications, an industry-leading training programme and mandatory Continuing Professional Development.

**Question 1: The Call for Evidence consultation showed that there was broad support for the proposed vision, objectives and timeframe for the Strategy. Based on the comments received we have updated these for the draft Strategy – are you content with these?**

1. As indicated in our response to the Draft Housing Supply Strategy Call for Evidence, and despite the amendment to Objective 1, we remain concerned about whether an ambition to meet housing demand is achievable. Given the prevailing pressures on housing delivery and the lack of quantifiable data on housing demand, we would urge the Northern Ireland Executive to plan for housing need in order to meaningfully correct the historic under-supply of homes that meet normative housing standards. Additionally, the Housing Supply Strategy outlines the aim to create a system that can deliver at least 100,000 homes to 2037, which appears reflective of housing need requirements rather than need and demand.

**Question 2: The assessment of the Call for Evidence has enabled us to develop a total of 15 longer term policies and interventions that will provide the basis to develop appropriate action plans. Do you agree with the focus of these 15 high-level, long-term policies and interventions?**

2. Yes, Propertymark agrees with the focus of the longer-term policies identified in the Strategy.

**Question 3: The Strategy includes an enabling principle to: 'Adopt a whole system approach, collaborate with central and local government and the third and private sectors to inclusively transform supply.' Do you agree with the proposed enabling principle?**

3. Propertymark agrees with the aim of the enabling principle but is unclear about how it will be applied in practice. It appears to simply express an intention to work collaboratively but establishes no mechanism for doing so. We are therefore somewhat doubtful of its efficacy in practice.

**Question 4: Do you agree with the proposed ambition to deliver 100,000 plus homes over the 15-year lifespan of the Strategy?**

4. Propertymark considers the target to be lacking in ambition, particularly if both housing need and demand are to be met. Though acknowledging the target as a minimum threshold for housing delivery, over the course of the Strategy it equates to just 6,667 new homes per year, which represents a 15.5 per cent reduction in the average number of annual completions over the fifteen years to 2020.<sup>1</sup> We would therefore urge the Northern Ireland Executive to review

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<sup>1</sup> Department of Finance, New Dwelling Statistics 2005-2020: <https://www.finance-ni.gov.uk/publications/new-dwelling-statistics>.

its assessment of housing need and demand and establish an accurate yet deliverable target that is broken down by tenure.

**Question 5: Do you agree with the proposed indicators to measure the success and progress of the Housing Supply Strategy?**

5. Yes, Propertymark considers the indicators proposed to be appropriate. We are encouraged to see that the House Condition Survey 2022 is underway but note that the findings of the last Survey were not published until 2018, two years after it was commenced. We would urge the Northern Ireland Executive to ensure that the results of the current Survey are published in a timely manner to enable the data to be used in policy development.

**Question 6: Are there any additional indicators that you consider would add value in measuring success and progress?**

6. Propertymark suggests that Census data could be included as an additional indicator, for example as a measure of concealed households and overcrowded accommodation.

**Question 7: How can we best ensure that key strategic partners such as other Departments, local government, the Voluntary & Community sector and private sector can participate in the delivery and oversight of the Supply Strategy delivery?**

7. Propertymark suggests that more work to develop the 'enabling principle' particularly with regard to its practical application would be beneficial in ensuring that key partners are able to participate in the delivery of the Strategy.

**Question 8: Are there any proven or new approaches you are aware of, that you believe would help us work best with other organisations to develop and deliver the action plans?**

8. Propertymark does not have sufficient expertise to respond to this question.

**Question 9: There was broad support in the Call for Evidence for the need to engage local communities in housing supply to create sustainable, thriving and inclusive communities. In what way do you consider this could best be achieved and do you have any examples of best practice in this area?**

9. Propertymark considers some of the community engagement tools used in Scotland, particularly in the context of local plan development, to be effective and would urge the Executive to review these to establish whether they could be effectively replicated in Northern Ireland. PAS (formerly Planning Aid Scotland) has developed an engagement model and guidance which the Northern Ireland Executive may find useful; it outlines three levels of engagement across eight criteria including transparency, inclusiveness and evaluation in order to achieve better community involvement in the planning process.<sup>2</sup>

**Question 10: Do you agree with the findings of the EQIA?**

10. Propertymark has no comments on the findings of the EQIA.

**Question 11: Are there any other inequalities that have not been highlighted in the EQIA that you believe the EQIA needs to note?**

11. Propertymark has no comments on the EQIA.

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<sup>2</sup> PAS, Successful Planning = Effective Engagement and Delivery: <http://www.pas.org.uk/speed/>.

**Question 12: Do you agree with the immediate next steps as outlined in Section 5 of the EQIA?**

12. Propertymark has no comments on the EQIA.

**Question 13: The Rural Needs Impact Assessment outlines that the development of the Housing Supply Strategy is likely to have a positive impact on people on Rural Areas? Do you agree with this assessment?**

13. Yes, Propertymark agrees that, provided housing need in rural areas is accurately assessed, planned for and met, the Housing Supply Strategy is likely to have a positive impact on rural communities and their residents.

**Question 14: Is there any other evidence, information or issues you think should be considered in this screening? General We would welcome any other comments or suggestions you have that you consider are relevant to developing and delivering the Housing Supply Strategy.**

14. Propertymark has no further comments.